

1 SCOTT A. KRONLAND (SBN 171693)  
2 skronland@altshulerberzon.com  
3 P. CASEY PITTS (SBN 262463)  
4 cpitts@altshulerberzon.com  
5 ALTSHULER BERZON LLP  
6 177 Post Street, Suite 300  
7 San Francisco, CA 94108  
8 Telephone: (415) 421-7151  
9 Facsimile: (415) 362-8064

7 IRA L. GOTTLIEB (SBN 103236)  
8 igottlieb@bushgottlieb.com  
9 BUSH GOTTLIEB, A Law Corporation  
10 801 North Brand Boulevard, Suite 950  
11 Glendale, California 91203-1260  
12 Telephone: (818) 973-3200  
13 Facsimile: (818) 973-3201

11 *Attorneys for Defendant United Teachers Los Angeles*

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA

15 THOMAS FEW,

16 Plaintiff,

17 v.

18 UNITED TEACHERS LOS ANGELES,  
19 *et al.*,

20 Defendants.

CASE NO: 2:18-cv-09531-JLS-DFM

**UTLA'S NOTICE OF MOTION AND  
MOTION FOR SUMMARY  
JUDGMENT**

Hearing Date: Dec. 13, 2019

Hearing Time: 10:30 a.m.\*

Location: Courtroom 10A

Hon. Josephine L. Staton

27 \_\_\_\_\_  
28 \* The parties will submit a request to waive oral argument on their motions for summary judgment.

**NOTICE OF MOTION AND MOTION**

Please take notice that defendant United Teachers Los Angeles (“UTLA”) will, and hereby does, move for an order of summary judgment pursuant to Federal Rule of Civil Procedure 56 on the ground that Plaintiff’s remaining claim, Count I of the First Amended Complaint (Dkt. 38), fails as a matter of law on the undisputed facts.

This motion is made following the conference of counsel pursuant to Local Rule 7-3, which took place on October 11, 2019.

This motion is set for hearing on December 13, 2019, at 10:30 a.m. in Courtroom 10A, 10th Floor, 411 W. Fourth Street, Santa Ana, California, before the Honorable Josephine L. Staton. The parties will submit a request to waive oral argument on this motion and any other motions for summary judgment set for hearing on that date. This motion is based on the accompanying Memorandum of Points and Authorities, the parties’ agreed-upon Statement of Undisputed Facts and accompanying exhibits, UTLA’s Statement of Uncontroverted Material Facts and Conclusions of Law, the Declaration of Harry Mar, the complete files and records of this action, and such other matters as the Court may properly consider in ruling on the motion.

Dated: October 18, 2019

Respectfully submitted,

By: /s/P. Casey Pitts  
P. Casey Pitts

SCOTT A. KRONLAND  
P. CASEY PITTS  
ALTSHULER BERZON LLP

IRA L. GOTTLIEB  
BUSH GOTTLIEB, A Law Corporation

*Attorneys for Defendant  
United Teachers Los Angeles*